

material.²⁸¹ The President's lawyers argued that "Plaintiff's purported 'other acts' evidence concerning other women . . . is irrelevant to resolution of this Motion, because plaintiff cannot establish that she herself suffered a cognizable injury pursuant to a claim for sexual harassment or outrage."²⁸² The President's lawyers added that "[t]hus, even if plaintiff had evidence with respect to other women that could be said to establish a 'pattern and practice' of sexual harassment -- which we vigorously contend she does not -- such evidence is not material to this summary judgment motion"²⁸³ On Wednesday, March 4, 1998, Mr. Ferguson filed his motion for summary judgment.²⁸⁴

On Monday, March 9, 1998, Judge Wright issued an order denying Ms. Jones's motion for reconsideration of the decision to exclude the Monica Lewinsky evidence. The order provided in relevant part:

The Court does not take the denial of plaintiff's motion for reconsideration lightly. The Court readily acknowledges that evidence of the Lewinsky matter might have been relevant to plaintiff's case and, as she argues, that such evidence might possibly have helped her establish, among other things, intent, absence of

²⁸¹ President Clinton's Motion for Summary Judgment, Jones v. Clinton, No. LR-C-94-290 (Feb. 17, 1998); Memorandum in Support of President Clinton's Motion for Summary Judgment, Jones v. Clinton, No. LR-C-94-290 (Feb. 17, 1998).

²⁸² Memorandum in Support of President Clinton's Motion for Summary Judgment at 3, Jones v. Clinton, No. LR-C-94-290 (Feb. 17, 1998).

²⁸³ Id.

²⁸⁴ Jones v. Clinton, 990 F. Supp. 657, 666 (E.D. Ark. 1998).